LOUISVILLE METRO
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204

May 01, 2013

FEDOOP Statement of Basis

Company: PPG Architectural Finishes Inc.

Plant Location: 6804 Enterprise Drive, Louisville, Kentucky 40233

Date Application Received: 04/28/2008

Date of Draft Permit: 05/01/2013 **Date of Proposed Permit:** 05/01/2013

District Engineer: Shannon Hosey **Permit No:** 124-97-F (R4)

Plant ID: 168 **SIC Code:** 2851 N**AICS**: 325510 **AFS:** 00168

Introduction:

This permit will be issued pursuant to District Regulation 2.17, *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), carbon monoxide (CO), 1 hr and 8 hr ozone (O_3), and particulate matter less than 10 microns (PM_{10}); and is a non-attainment area for particulate matter less than 2.5 microns ($PM_{2.5}$).

Application Type/Permit Activity:

[ ] Initial Issuance

[ ] Permit Revision
- [ ] Administrative
- [ ] Minor
- [ ] Significant

[X] Permit Renewal

Compliance Summary:

[X] Compliance certification signed
[ ] Source is out of compliance
[ ] Compliance schedule included
[X] Source is operating in compliance

I. Source Information

1. Source Description: PPG Architectural Finishes manufactures paint.

2. Emission Unit Summary: PPG Architectural Finishes operates three emission units.

Emission Unit	Equipment Description
U1	Forty-four (44) tinting/thinning tanks in stain manufacturing area. (Permit 11-74) Four (4) Myers pigment dispersers employing mineral spirits. Pigment dust to be controlled by an existing bag collector. System includes four (4) 1000 gal tanks each, four (4) 600 gal tanks each, and one (1) 250 gal tank. (Permit 12-74) Latex Production: Three (3) Myers dispersers of the following capacities; one (1) 1000 gal, one (1) 250 gal and one (1) 100 gal. Pigment is controlled by Torit dust collector. Three (3) holding tanks 2,000 gal each for rinsing & cleaning operations. (Permit 408-74) Twenty-two (22) 3300 gal latex and finishing tanks used for latex coating production, two (2) 450 gal tanks each, one (1) 600 gal tank, and one (1) 12,000 gal Masterbatch blending tank. (Permit 410-74) One (1) Ambrose paint filling line to transfer final product into five-gallon containers (Construction Permit 194-04-C). Small Can, F-Style, Machine 1, Machine 2, Machine 4 and Neupack 5 paint filling lines and sand blast equipment (existing equipment discovered on inspection) One (1) Masterbatch Thindown tank, capacity 11,546 gal (Construction Permit 221-04-C). One (1) caulk mixing system, comprised of mix head and formulating vessels and one (1) cartridge type dust collector, Torit model #90 (Construction Permit 35315-12-C) One (1) 3300 gallon dispersion tank, one (1) 200 HP Hockmeyer disperser and one (1) Neupack one-gallon filling line. (Construction Permit 37164-13-C)

Emission Unit	Equipment Description
U2	Six (6) above-ground solvent storage tanks (Permit 10-74) as follows: Exterior Storage Tank #1 14,000 Gallons, Exterior Storage Tank #2 14,000 Gallons, Exterior Storage Tank #3 14,000 Gallons, Exterior Storage Tank #5 20,000 Gallons, Exterior Storage Tank #6 20,000 Gallons, Exterior Storage Tank #9 20,000 Gallons Six (6) storage tanks (Permit 407-74) as follows: Interior Storage Tank #15 12,000 Gallons, Interior Storage Tank #16 12,000 Gallons, Interior Storage Tank #20 10,000 Gallons, Interior Storage Tank #18 10,000 Gallons, Interior Storage Tank #17 10,000 Gallons, Interior Storage Tank #19 10,000 Gallons Two (2) Double compartment holding tanks with four (4) 2,000 gal each storage compartments. Tanks 21, 22, 23, and 24 (Permit 326-80) Four (4) above-ground storage tanks with submerged fill pipes: (Permit 190-90) (Construction Permit 353-03) Exterior Storage Tank #7 20,000 Gallons, Exterior Storage Tank #8 20,000 Gallons, Exterior Storage Tank #4 20,000 Gallons, Interior Storage Tank #14 12,000 Gallon with submerged fill pipes Two (2) raw material storage tanks (Permit 277-90). Interior Storage Tank #25 12,000 Gallons, Interior Storage Tank #26 12,000 Gallons Two (2) bulk storage tanks, (Permit 6-99) Interior Storage Tank #11 6,800 Gallons, Interior Storage Tank #12 6,800 Gallons One (1) above-ground outside storage tank with submerged fill, 20,000 gal capacity, (Permit 75-01) Tank 10 One (1) fixed-roof storage tank Construction Permit – 252-05-C) Interior Storage Tank #27 12,000 Gallons Two (2) 10,800 gal fixed-roof storage vessels (Construction Permit – 364-06-C) Interior Storage Tank #28 10,800 Gallons, Interior Storage Tank #29 10,800 Gallons
IA1	Two (2) Selig Chemical Industries model # Recovery 80 maintenance parts washers. Two (2) cold solvent cleaning equipments with secondary reservoirs.

3. Fugitive Sources: There are no fugitive emissions.

4. FEDOOP Permit 124-97-F (R4) Revisions/Changes:

Revision	Issue Date	Public Notice Date	Type	Description
N/A	07/31/1998	06/14/1998	Initial	Initial Permit Issuance
R1	04/04/2000	03/05/2000	Minor	Incorporate revisions to General Conditions #4, #11, #12, and #13; New General Conditions #13 and #14
R2	01/27/2003	NA	Admin	Correct expiration date to correspond to 5-year permit term
R3	03/31/2004	12/21/2003	Renewal	Scheduled Permit Renewal; Incorporate Construction permit 353-03-C
R4	xx/xx/2013	05/01/2013	Renewal	Scheduled Permit Renewal; Incorporate Construction permits 194-04-C, 221-04-C, 252-05-C, 364-06-C and 35315-12-C

5. Emission Summary:

Pollutant	Actual Emissions (tpy) 2009 Data	Pollutant that triggered major source status
CO	0	No
NO_x	0	No
SO_2	0	No
PM/PM_{10}	4.57	Yes
VOC	25.40	Yes
Single HAP	4.26	Yes
Total HAPs	5.32	Yes

6. Applicable Requirements:

[ ] PSD [ ] 40 CFR 60 [X] SIP [ ] 40 CFR 63
[ ] NSR [ ] 40 CFR 61 [X] District-Origin [ ] Other

7. Future MACT Requirements: NA

8. Referenced Federal Regulations in Permit: None

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.

2. **Stratospheric Ozone Protection Requirements**: Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

3. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

4. **Basis of Regulation Applicability**

Regulation	Basis for Applicability
2.17	Federally Enforceable District Origin Operating Permits
5.00	Standards for Toxic Air Contaminants and Hazardous air Pollutants, Definitions
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Regulation 5.21 establishes the requirements for Environmental Acceptability for Toxic Air Contaminants (TACs).
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
6.09	Regulation 6.09 establishes emission standards for processes that emit PM which were constructed before September 1, 1976.
6.13	Applicable to each VOC storage vessel that commences construction or modification before April 19, 1972, and has a storage capacity greater than 250 gallons
6.18	Applies to each cold cleaners, open top vapor degreasers, and conveyorized degreasers that use volatile organic compounds (VOCs) to remove soluble impurities from metal surfaces.
6.24	Any affected facility using any organic materials which was in being prior to June 13, 1979.
7.08	Regulation 7.08 establishes emission standards for processes that emit PM which were constructed after September 1, 1976.
7.25	Regulation 7.25 establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District

Regulation	Basis for Applicability
	Regulation 7, and apply to new processes commenced after June 13, 1979
40 CFR 60 Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

a. **Plant-wide major source limits**

Regulation 2.17 applies to PPG Architectural Finishes since the potential emissions of VOC, PM, single HAP and total HAP could exceed the major source threshold levels.

The source is required to report the total *plant-wide* consecutive 12-month emissions of VOC and PM for each month in the reporting period.

The source is required to limit the plant-wide emissions of any individual HAP to less than 10 tons during any consecutive 12-month period. For all HAPs combined, the source is required to limit the plant-wide emissions of all HAPs to less than 25 tons during any consecutive 12-month period.

The source is required to report the total *plant-wide* calendar month and consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

b. **STAR Program**

Regulations 5.00, 5.01, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.

c. **Equipment:**

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
U1	E1	Tinting/Thinning Tank 1800 Gallons	6.24	N/A
	E2	Tinting/Thinning Tank 1800 Gallons		
	E3	Tinting/Thinning Tank 3300 Gallons		
	E4	Tinting/Thinning Tank 3300 Gallons		
	E5	Tinting/Thinning Tank 3300 Gallons		
	E6	Tinting/Thinning Tank 3300 Gallons		
	E7	Tinting/Thinning Tank 3300 Gallons		
	E8	Tinting/Thinning Tank 3300 Gallons		
	E9	Tinting/Thinning Tank 3300 Gallons		
	E10	Tinting/Thinning Tank 3300 Gallons		

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
	E11	Tinting/Thinning Tank 7000 Gallons		
	E12	Tinting/Thinning Tank 7000 Gallons		
	E13	Tinting/Thinning Tank 7000 Gallons		
	E14	Tinting/Thinning Tank 7000 Gallons		
	E15	Tinting/Thinning Tank 1500 Gallons		
	E16	Tinting/Thinning Tank 1500 Gallons		
	E17	Tinting/Thinning Tank 600 Gallons		
	E18	Tinting/Thinning Tank 500 Gallons		
	E19	Tinting/Thinning Tank 500 Gallons		
	E20	Tinting/Thinning Tank 500 Gallons		
	E21	Tinting/Thinning Tank 500 Gallons		
	E22	Tinting/Thinning Tank 500 Gallons		
	E23	Tinting/Thinning Tank 500 Gallons		
	E24	Tinting/Thinning Tank 500 Gallons		
	E25	Tinting/Thinning Tank 500 Gallons		
	E26	Tinting/Thinning Tank 500 Gallons		
	E27	Tinting/Thinning Tank 500 Gallons		
	E28	Tinting/Thinning Tank 500 Gallons		
	E29	Tinting/Thinning Tank 500 Gallons		
	E30	Tinting/Thinning Tank 500 Gallons		
	E31	Tinting/Thinning Tank 500 Gallons		
	E32	Tinting/Thinning Tank 500 Gallons		
	E33	Tinting/Thinning Tank 2500 Gallons		
	E34	Tinting/Thinning Tank 2500 Gallons		
	E35	Tinting/Thinning Tank 2500 Gallons		
	E36	Tinting/Thinning Tank 2500 Gallons		
	E37	Tinting/Thinning Tank 2500 Gallons		
	E38	Tinting/Thinning Tank 2500 Gallons		
	E39	Tinting/Thinning Tank 2500 Gallons		
	E40	Tinting/Thinning Tank 2500 Gallons		
	E41	Tinting/Thinning Tank 2500 Gallons		
	E42	Tinting/Thinning Tank 2500 Gallons		
	E43	Tinting/Thinning Tank 2500 Gallons		
	E44	Tinting/Thinning Tank 2500 Gallons		
	E45	Pigment Disperser Myers 100 HP	6.09 and 6.24	C1
	E46	Pigment Disperser Myers 100 HP		
	E47	Pigment Disperser Myers 50 HP		
	E48	Pigment Disperser Myers 50 HP		
	E49	Tank 1000 Gallon		NA
	E50	Tank 1000 Gallon		
	E51	Tank 1000 Gallon		
	E52	Tank 1000 Gallon		
	E53	Tank 600 Gallon		
	E54	Tank 600 Gallon		

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
	E55	Tank 600 Gallon		
	E56	Tank 600 Gallon		
	E57	Tank 250 Gallon		
	E58	Disperser Myers 100 HP	6.09 and 6.24	C2
	E59	Disperser Myers 100 HP		
	E60	Disperser Myers 50 HP		
	E61	Holding Tank 2,000 Gallon		NA
	E62	Holding Tank 2,000 Gallon		
	E63	Holding Tank 2,000 Gallon		
	E64	Latex and Finishing Tank 3300 Gallon	6.24	NA
	E65	Latex and Finishing Tank 3300 Gallon		
	E66	Latex and Finishing Tank 3300 Gallon		
	E67	Latex and Finishing Tank 3300 Gallon		
	E68	Latex and Finishing Tank 3300 Gallon		
	E69	Latex and Finishing Tank 3300 Gallon		
	E70	Latex and Finishing Tank 3300 Gallon		
	E71	Latex and Finishing Tank 3300 Gallon		
	E72	Latex and Finishing Tank 3300 Gallon		
	E73	Latex and Finishing Tank 3300 Gallon		
	E74	Latex and Finishing Tank 3300 Gallon		
	E75	Latex and Finishing Tank 3300 Gallon		
	E76	Latex and Finishing Tank 3300 Gallon		
	E77	Latex and Finishing Tank 3300 Gallon		
	E78	Latex and Finishing Tank 3300 Gallon		
	E79	Latex and Finishing Tank 3300 Gallon		
	E80	Latex and Finishing Tank 3300 Gallon		
	E81	Latex and Finishing Tank 3300 Gallon		
	E82	Latex and Finishing Tank 3300 Gallon		
	E83	Latex and Finishing Tank 3300 Gallon		
	E84	Latex and Finishing Tank 3300 Gallon		
	E85	Latex and Finishing Tank 3300 Gallon		
	E86	Blending Tank 450 Gallon		
	E87	Blending Tank 450 Gallon		
	E88	Blending Tank 600 Gallon		
	E89	Blending Tank 12,000 Gallon		
	E90	Ambrose Paint Filling Line	7.25	NA
	E91	Small Can Filling Line		
	E92	F-Style Container Filling Line		
	E93	Machine 1 Gallon Filling Line		
	E94	Machine 2 Gallon Filling Line		
	E95	Machine 4 Gallon Filling Line		
	E96	Neupak 5 Gallon Filling Line		

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
	E97	Sand Blaster	7.08	
	E98	Thindown Tank 11,546 Gallons	7.25	
	E99	Caulk Mixing System with Dust Collector	7.08 and 7.25	C3
	E100	3300 gallon dispersion tank with a 200 HP Hockmeyer disperser	7.08 and 7.25	C3
	E101	Neupack one-gallon filling line	7.25	NA
U2	E102	Exterior Storage Tank #2 14,000 Gallons	6.13	NA
	E103	Exterior Storage Tank #3 14,000 Gallons		
	E104	Exterior Storage Tank #1 14,000 Gallons		
	E105	Exterior Storage Tank #5 20,000 Gallons		
	E106	Exterior Storage Tank #6 20,000 Gallons		
	E107	Exterior Storage Tank #9 20,000 Gallons		
	E108	Interior Storage Tank #15 12,000 Gallons		
	E109	Interior Storage Tank #16 12,000 Gallons		
	E110	Interior Storage Tank #20 10,000 Gallons		
	E111	Interior Storage Tank #18 10,000 Gallons		
	E112	Interior Storage Tank #17 10,000 Gallons		
	E113	Interior Storage Tank #19 10,000 Gallons		
	E114	Double Compartment Holding Tanks #21 & 22 with 2000 Gallon Storage Compartments	7.12	
	E115	Double Compartment Holding Tanks #23 & 24 with 2000 Gallon Storage Compartments		
	E116	Exterior Storage Tank #7 20,000 Gallons		
	E117	Exterior Storage Tank #8 20,000 Gallons		
	E118	Exterior Storage Tank #4 20,000 Gallons		
	E119	Interior Storage Tank #14 12,000 Gallon with submerged fill pipes		
	E120	Interior Storage Tank #25 12,000 Gallons		
	E121	Interior Storage Tank #26 12,000 Gallons		
	E122	Interior Storage Tank #11 6,800 Gallons		
	E123	Interior Storage Tank #12 6,800 Gallons		
	E124	Exterior Storage Tank #10 20,000 Gallon with submerged fill pipes	40 CFR 60 Subpart Kb	
	E125	Interior Storage Tank #27 12,000 Gallons	7.12	
	E126	Interior Storage Tank #28 10,800 Gallons		
	E127	Interior Storage Tank #29 10,800 Gallons		
IA1	E128	Selig Chemical Industries Parts Washer	6.18	NA
	E129	Selig Chemical Industries Parts Washer		
	E130	Parts Washer with Secondary Reservoir		
	E131	Parts Washer with Secondary Reservoir		

d. **Standards/Operating Limits**

i. **VOC**

1) VOC emissions from the equipment cannot exceed 100 tons, plant-wide, during any consecutive 12-month period per Regulation 2.17.

2) VOC emissions from equipment subject to Regulation 7.25 cannot exceed five (5) tons, plant-wide, during any consecutive 12-month period unless a BACT is submitted and approved.

3) VOC emissions from Emission Unit E99 shall be limited to less than 5 tons from the BACT submitted May 20, 2003in accordance with 7.25.

4) Regulation 6.24 limits the pound per hour and pound per day emission of Class II and Class III Solvents. .

5) Regulation 6.13 and 7.12, section 3.3 requires submerged fill if the VOC materials have an as stored vapor pressure of 1.5 psia or greater. Regulation 6.13, 7.12 and 40 CFR 60, Subpart Kb applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.

6) Regulation 6.18, section 4 establishes the requirements to install, maintain, and operate the parts washers.

ii. **Opacity**

Regulation 6.09, section 3.3.1 and Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

iii. **PM**

For emission points subject to Regulation 6.09 and Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2 and 3.2. The equation to calculate the hourly PM emission limit is $E = 4.10\ P^{0.67}$ for 6.09 or $E = 3.59 * P^{0.62}$ for 7.08, where E is the allowable lb/hr PM emission limit and P is the process weight rate expressed in tons/hr.

iv. **HAP**

Regulation 2.17, section 5.1 establishes the requirement to include specific conditions in the permit to limit the plant-wide emissions of individual and total combined HAPs to avoid Title V permitting.

v. **TAC**

Regulations 5.00, 5.01, 5.21 and 5.23 (STAR Program) establish requirements for environmental acceptability of TACs and the requirement to comply with all applicable emission standards.

e. **Monitoring and Record Keeping**

i. **VOC**

Emissions Calculation Methodology**:** The emission calculations are based upon the material usage rate and the VOC content as applied. The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank.

Regulation 2.17, section 5.2 requires sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

ii. **Opacity**

Regulation 6.09 and 7.08 do not require any specific monitoring or record keeping requirements for opacity. However, Regulation 2.17, section 5.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The source is required to conduct a monthly visible emission survey and maintain records of the results to assure ongoing compliance with the opacity standard.

iii. **PM**

Regulation 6.09 and 7.08 do not require any specific monitoring or record keeping requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

iv. **HAP**

Emissions Calculation Methodology**:** The emission calculations are based upon the throughput of HAP containing material used and weight percent of the HAP.

Regulation 2.17, section 5.2 establishes requirements to include permit terms and conditions to assure that the plant-wide emissions from a source remain below the major source threshold levels.

v. **TAC**

Regulation 5.21, section 4.10 establishes monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

f. **Reporting**

i. **VOC**

Regulation 2.17, section 5.2 requires reporting to assure compliance with the terms and conditions of the permit.

ii. **Opacity**

Regulation 6.09 and 7.08 do not require any specific reporting requirements for opacity. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any deviation from the requirement to perform monthly VE surveys or Method 9 tests and the occurrences of VE surveys where visible

iii. **PM**

Regulation 6.09 and 7.08 do not require any specific reporting requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **HAP**

Regulation 2.17, section 5.2 requires sufficient reporting to assure ongoing compliance with the terms and conditions of the permit.

v. **TAC**

Regulation 5.21, sections 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change that impacts the demonstration of environmental acceptability.

III. Other Requirements

1. Temporary Sources: The source did not request to operate any temporary facilities.

2. Short Term Activities: The source did not report any short term activities.

3. Emissions Trading: N/A

4. Alternative Operating Scenarios: The source did not request to operate under any alternative operating scenarios.

5. Compliance Status: PPG Architectural Finishes, Inc. is currently in compliance.

6. Compliance History: The source submitted a signed FEDOOP compliance certification.

There are no records of any violations of the terms of the present or prior construction or operating permits.

7. Permit Fees: The FEDOOP permit fee is based on *plant-wide* allowable emissions of less than 100 tons per year, but greater than 50 tons per year of VOC accordance with Regulation 2.08, sections 2.6.5.3.

8. Insignificant Activities

Description	Quantity	Basis
Brazing, Soldering, or Welding Equipment, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	1	Regulation 2.02, section 2.3.4
Woodworking, except for conveying hogging or burning woods/sawdusts	1	Regulation 2.02, section 2.3.5
Cold solvent parts cleaners (See Emission Unit IA1)	4	Regulation 2.02, section 2.3.15
Laboratory ventilating and exhausting systems which are not used for radioactive air contaminants	1	Regulation 2.02, section 2.3.11

Description	Quantity	Basis
Dust or particulate collectors that are located in-doors, vent directly indoors into the work space, collect no more than one ton of material per year and do not collect materials listed in Regulation 5.11, 5.12 or 5.14	1	Regulation 2.02, section 2.3.21

1) Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2) Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source.

3) For all insignificant activities that emit regulated air pollutants for which the company has accepted a *plant-wide* synthetic minor limit, the company shall maintain sufficient records to calculate the emissions and report those emissions in the annual compliance reports.